

**UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Michael F. White, Sr.	:	Chapter 13
		:	
	Debtor	:	
<hr/>		:	
Toyota Lease Trust		:	
Movant		:	Bankruptcy Case Number
		:	16-18132 JKF
		:	
v.		:	
		:	
Michael F. White, Sr.		:	
		:	
Respondent/Debtor		:	
		:	
And		:	
		:	
Frederick Reigle, Esquire		:	
Trustee		:	

## **Debtor's Response to the Motion of Toyota Lease Trust for Relief from the Automatic Stay**

Debtor, **Michael F. White, Sr.**, by and through his counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this response to the Motion for Relief of Toyota Lease Trust and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. DENIED. Answering Debtor denies the allegations contained in this paragraph as

conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

5. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

6. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, evidence of payment for each and every month since the filing of the bankruptcy has been presented to the Movant's counsel.

7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, evidence of payment for each and every month since the filing of the bankruptcy has been presented to the Movant's counsel.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, evidence of payment for each and every month since the filing of the bankruptcy has been presented to the Movant's counsel.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

**WHEREFORE**, Debtor, **Michael F. White**, requests this Honorable Court deny the motion of Toyota Lease Trust for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
Attorney for Debtor